

In the Matter of)
)
Advanced Television Systems) MM Docket No. 87-268
and Their Impact upon the)
Existing Television Broadcast)
Service)

To: The Commission

WMMP Licensee L.P., licensee of WMMP(TV), Charleston, South Carolina (“WMMP”), through its attorneys, hereby petitions the Commission for partial reconsideration of the *Seventh Report and Order*, FCC 07-138, adopted in the above-captioned docket on August 1, 2007 and released on August 6, 2007 (“*Seventh Report and Order*”). In the *Seventh Report and Order*, the Commission adopted a modified post-transition digital television table (“DTV Table”) of allotments and accompanying Appendix B.

¹ See Exhibit 1. The Engineering Statement does not yet include all the parameters necessary to make the requested modifications to the DTV Table for the station. However, the station intends to submit a supplement to the instant Petition as expeditiously as possible to provide that information.

impermissible interference to any other allotments or operating stations. Consequently, WMMP urges the Commission to partially reconsider the *Seventh Report and Order* and to make the requested changes to the DTV Table.

Respectfully submitted,

WMMP Licensee L.P.

By: /s/

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Dated: October 26, 2007

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EXHIBIT 1

CARL T. JONES
CORPORATION

**STATEMENT OF JOHN E. HIDLE, JR.
IN SUPPORT OF A
PETITION FOR PARTIAL RECONSIDERATION
OF THE DTV TABLE OF ALLOTMENTS
WMMP-DT - CHARLESTON, SOUTH CAROLINA
DTV - CH. 35, 46 kW, ERP; 583.3 M HAAT**

Prepared for: WMMP LICENSEE L.P.

I am an Engineer, an employee in the firm of Carl T. Jones Corporation, with offices located in Springfield, Virginia. My education and experience are a matter of record with the Federal Communications Commission.

GENERAL

WMMP Licensee L.P. licensee of WMMP(TV), Channel 36, Charleston, South Carolina, and permittee of the paired Digital Television Allotment for WMMP-DT, Channel 35, has authorized this office to prepare this statement, and associated exhibits as part of a Petition For Partial Reconsideration of the DTV Table of Allotments. It is requested herein to correct the FCC antenna identification number to reflect the correct pattern for the WMMP-DT facility on its post-transition channel, and to adjust the effective radiated power based upon an appropriate interference analysis utilizing the corrected antenna pattern.

TECHNICAL FACILITY AS REFLECTED IN THE DTV TABLE OF ALLOTMENTS

The Seventh Report and Order and Eighth Further NPRM (MB Docket 87-268) includes the recently adopted DTV Table of Allotments, that identifies the specific technical facilities at

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which the Commission has proposed to allow DTV stations to operate after the DTV transition. The facilities included in the DTV Table of Allotments are those for which broadcasters were required by the Commission to certify a specific coverage area based upon their ability to "build out" to the level of checklist or maximized facilities as reflected in their FCC authorizations. WMMP Licensee, L.P. understands its obligations under the Commission's policy that broadcasters' final facilities must cover their certified coverage area as approved by the Commission. Further, the permittee of WMMP-DT wishes to avoid loss of any current coverage area of either its digital or analog facilities based on the inclusion of an incorrect antenna pattern or ERP in the DTV Table of Allotments.

WMMP-DT, Charleston, South Carolina has an outstanding Construction Permit and Application for License to Cover on file to operate on Channel 35 at 46 kW ERP, 583.3 m HAAT on a directional transmitting antenna shared in common with several other stations, including WMMP(TV)'s analog facility on Channel 36. WMMP-DT has selected its analog Channel 36 to be utilized by its ultimate post-transition facility. The Seventh Further Notice shows WMMP-DT as authorized to operate at 50 kW ERP at 583.3 m HAAT on Channel 36, utilizing a directional pattern indicated as FCC Antenna Identification Number 74514, which is a theoretical pattern created by the Commission based upon dipole factor calculations. The license of the current analog facility of WMMP(TV) reflects the use of FCC Antenna Identification Number 67838, which refers to actual specifications of the common antenna, Dielectric Model TUD-P5SP-16/48-1-B, and this differs significantly from the pattern reflected in the DTV Table of Allotments.

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Therefore, it is erroneous for the DTV Table of Allotments to reflect the use of FCC Antenna Identification Number 74514 by WMMP-DT on Channel 36. Instead, the Table should reflect the use of FCC Antenna Identification Number 67838 on Channel 36, because this is the actual pattern currently reflected in the current analog Construction Permit BPCT-20040503AAR, and pending Application for License to Cover, BLCT-20051121AMF of the analog facility of WMMP(TV), currently operating on Channel 36, rather than a theoretical pattern based upon dipole factor calculations.

The permittee of WMMP-DT seeks leave to file a supplemental technical statement to request an appropriate adjustment to the effective radiated power reflected in the DTV Table of Allotments based upon further study of the facility based on use of the appropriate antenna pattern, FCC ID Number 67838, and considering other factors relevant to DTV coverage areas and analysis of interference to other stations.

SUMMARY

It is submitted that the proposal described herein complies with the Rules and Regulations of the Federal Communications Commission. This statement and the attached exhibits were prepared by me or under my direct supervision and are believed to be true and correct to the best of my knowledge and belief.

Dated: October 26, 2007


John E. Hidle, Jr.